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June 1, 2017

Honorable John Michael Vazquez, U.S.D.J.
United States District Court for the District of New Jersey
U.S. Courthouse and Post Office Building
50 Walnut Street, Courtroom PO 03
Newark, New Jersey 07101

**Re: *Democratic National Committee, et al. v. Republican National Committee, et al.*,
Civil Action No.: 81-3876 (JMV) (JBC)**

Dear Judge Vazquez:

In response to the DNC's letter to the Court dated May 31, 2017, the RNC does not object to a case management conference and is available for one on a date and at a time that is convenient for the Court. Nonetheless, the RNC rejects the DNC's assertion that the RNC has engaged in dilatory and obstructive conduct. As it did in response to discovery permitted by the Court last fall, the RNC has responded reasonably to the DNC's document demands and worked diligently to produce non-privileged, responsive documents.

On January 4, 2017, the Court held a hearing on the DNC's request for discovery in support of its motion for an order to show cause, and granted discovery "limited to requests related to the DNC's allegations raised and considered by the Court in its November 5, 2016 Opinion." Order (ECF No. 146). *See also* Hr'g Tr. 20:6-23 (Jan. 4, 2017) (explaining the Court would grant "targeted discovery" that is "tied to the allegations that have been made."). On January 25, 2017, the DNC served twenty document requests on the RNC. The parties attempted to resolve disagreements over the scope of the requests during conference calls on February 7, February 13, and March 6, 2017.

After several requests by the RNC, the DNC served its final version of the document requests on March 22, 2017. Within days of service, the RNC identified 26 individuals likely to have responsive documents and, on April 20, 2017, the RNC served its objections. The RNC has since interviewed several current and former employees regarding their document storage practices, collected over 161 gigabytes of electronically stored information, and reviewed over 5,200 documents (i.e., over 220,000 pages). The RNC has already begun producing documents, and is currently reviewing over 14,800 additional documents (i.e., over 577,000 pages) and collecting more ESI from the laptops of current and former employees and the RNC's server. The process is time-consuming and challenging, but the small number of non-privileged, responsive documents should not be surprising in light of the extensive efforts the RNC has undertaken to comply with the decree.

Honorable John Michael Vazquez, U.S.D.J.
United States District Court for the District of New Jersey
June 1, 2017
Page 2

Although it is unclear how many documents the RNC will need to review, the RNC will make every effort to complete the production by June 30, 2017. Given that the DNC required eleven weeks *just to serve its document requests*, the RNC's proposed production deadline is reasonable.

The RNC looks forward to answering any questions the Court may have about its document production, and also discussing whether discovery by the RNC into the bases of the DNC's allegations is appropriate and timely.

Respectfully submitted,

/s/ Bobby R. Burchfield
Bobby R. Burchfield

cc: DNC Counsel (by ECF)